

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket 97-185
Table of Allotments.) RM-9080
FM Broadcast Stations.) RM-9197
(Vergennes, Vermont and)
Willsboro, and Malone, New York))

To: Chief, Allocations Branch
Mass Media Bureau

JOINT REPLY TO COUNTERPROPOSAL

Cartier Communications Inc. ("Cartier") and Watertown Radio Associates Limited Partnership ("Watertown"), by their respective counsel, jointly file this Reply to Cartier's Counterproposal filed with respect to the Commission's Notice of Proposed Rule Making, *Vergennes, Vermont and Willsboro, New York*, DA 97-1775, released August 25, 1997 (the "NPRM").¹ In support whereof, Cartier and Watertown show the following:

Cartier is licensee of WVNV(FM), operating on Channel 243A, at Malone, New York. Cartier seeks the substitution of Channel 243C3 for Channel 243A at Malone and the upgrade of WVNV to operate on Channel 243C3 at reference coordinates **North latitude 44° 54' 40", West longitude 74° 06' 40"**. The NPRM was issued at the request of Watertown, licensee of WXPS(FM), Channel 244A, at Vergennes, Vermont.

¹ By Public Notice, Report No. 2239, dated November 26, 1997, the Commission afforded interested parties 15 days, or until December 11, 1997, to file reply comments to Cartier's counterproposal; thus this reply is timely filed.

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Watertown proposes to delete Channel 244A from Vergennes, Vermont, reallocate Channel 244A to Willsboro, New York, and modify the license of WXPS to operate at Willsboro as its new community of license. The reference coordinates proposed by Watertown for its Willsboro facilities would be North latitude 44°24'11" and West longitude 73°26'03".

As set forth in its Counterproposal, Cartier supports Watertown's proposal to change the community of license of WXPS to Willsboro, New York. Cartier and Watertown have agreed to cooperate with each other to achieve their respective goals and the parties **request the Commission to allot Channel 244A to Willsboro at new reference coordinates North latitude 44°19'20" and West longitude 73°21'00"** in order to provide clearance for WVNV to upgrade to Class C3 facilities consistent with the spacing requirements of Section 73.207 of the Rules. As a result, there is no choice to be made as to whether Willsboro, New York, should receive a new first local service or whether Malone, New York, should receive upgraded service on Channel 243 since both can co-exist with the modification of the Willsboro allocation reference point.

In light of the foregoing, Cartier and Watertown respectfully request the Commission to (a) substitute Channel 243C3 for Channel 243A at Malone, New York, (b) modify the license of WVNV to operate on Channel 243C3; (c) allot Channel 244A to Willsboro, New York, at reference coordinates **North latitude 44°19'20" and West longitude 73°21'00"**; and (d) modify the license of WXPS(FM) to operate on Channel 244A.

Respectfully submitted,

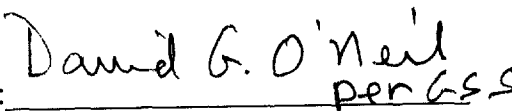
CARTIER COMMUNICATIONS INC.

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December 11, 1997

CERTIFICATE OF SERVICE

I, Angela Y. Powell, a secretary in the law offices of Smithwick & Belendiuk, P.C., hereby certify that a copy of the foregoing Joint Reply to Counterproposal was mailed, via first class mail, postage pre-paid, this the 11th day of December, 1997, to the following:

Ms. Pamela Blumenthal*
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